

REMARKS

Claims 1-37 are pending in this application. By this Amendment, claims 1, 14 and 26 are amended. No new matter is added.

Applicants thank Examiners Nguyen and Feild for the courtesies extended to Applicants' representatives during the May 21, 2003 Personal Interview. The points discussed are incorporated into the Remarks below and constitute the Applicants' record of the interview.

For at least the following reasons, Applicants submit that this application is in condition for allowance. Favorable reconsideration is respectfully requested.

I. REPLY TO REJECTIONS

Claims 1-37 are rejected under 35 U.S.C. §112, second paragraph as allegedly being indefinite. Specifically, the feature "a view medium of the at least one object is distinct from the annotation device" is stated to be unclear. As discussed at the personal interview, claims 1, 14 and 26 are amended to recite "device" rather than medium for consistency with the specification.

As fully described in the Summary of the Invention, the claim language indicates that the annotation device is a device that is separate or different or distinct or that differs from a viewing device (page 1, lines 21-22, page 2, lines 28-30, page 2, lines 31-32, page 3, lines 15-16, in the specification). One of ordinary skill in the art would readily understand the passage to mean that the viewing device and the annotation device are two devices that work in conjunction in the invention. The specific word used in the claim is "distinct". But equivalent words throughout the specification are "separate," "different," or "differs." Consequently, the feature recited in claims is definite. Withdrawal of the rejection of claims 1-37 is respectfully requested.

Claims 1-37 are rejected under 35 U.S.C. §103(a) over U.S. Patent 5,809,318 to Rivette et al. (hereinafter "Rivette 318"), in view of U.S. Patent 6,389,434 to Rivette et al. (hereinafter "Rivette 434"). The rejection is respectfully traversed.

As discussed at the personal interview, neither Rivette 318, Rivette 434, nor the

combination thereof, discloses an annotation system comprising a synchronize circuit that associates the at least one annotation and the link with the one object identifier, wherein the object identifier corresponds to the at least one object, and a viewing device of the at least one object that is distinct from the annotation device, as recited in claim 1.

Further, neither the references nor their combination discloses generating at least one annotation using an annotation device, associating the at least one annotation with the at least one object identifier, and displaying the at least one object and the at least one annotation with a viewing device that is distinct from the annotation device, as recited in claim 14.

Still further, neither the references nor their combination discloses information that generates at least one annotation using an annotation device, information that associates the at least one annotation with the at least one object identifier, and information that displays the at least one object and the at least one annotation with a viewing device that is distinct from the annotation device, as recited in claim 26.

Rivette 318 is directed toward synchronizing text and image files to produce equivalent files using heuristic algorithms to create an approximate equivalent relationship between the text and the image files (see Abstract). By relating the text and image files, Rivette 318 allows a user to selectively view an equivalent file in a window while simultaneously viewing an image file within one or more image windows on the display, and further allows the user to manipulate notes and subnotes as annotations to the documents. Rivette 318 fails to disclose or even suggest associating an annotation and one object identifier or providing a viewing device that is distinct from the annotation device, as recited in claims 1, 14 and 26.

Rivette 434 fails to overcome the deficiencies of Rivette 318. Rivette 434 is directed toward systems, methods, and especially a computer program for annotating documents where the annotation is a note. The improvement made by Rivette 434 is the ability to create subnotes to an annotated note so that the subnotes can also be separately organized into particular topics or be associated with other data objects that are related to the same topic (see col. 3, lines 65 - col. 4, lines 49-52). Rivette 434 also fails to disclose associating an annotation and one object identifier or providing the features, as recited in claims 1, 14 and 26.

Consequently, Rivette 318, Rivette 434, and the combination thereof fails to disclose each and every feature of claims 1, 14 and 26. Therefore, it is respectfully submitted that claims 1, 14 and 26 are patentable over the applied references. Claims 2-13, which depend from claim 1, claims 15-25, which depends from claim 14, and claims 27-37, which depends from claim 26 are patentable for at least the reasons discussed above, as well as for the additional features they recite. Withdrawal of the rejection of claims 1-37 is respectfully requested.

II. CONCLUSION

For at least the reasons discussed above, Applicants submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-37 are respectfully requested.

Should the Examiner believe that anything further would be desirable in order to place this application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



James A. Oliff
Registration No. 27,075

Klifton L. Kime
Registration No. 42,733

JAO:KLK:SSK/kap

Date: June 2, 2003

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

DEPOSIT ACCOUNT USE
AUTHORIZATION
Please grant any extension
necessary for entry;
Charge any fee due to our
Deposit Account No. 24-0037